

These recommended procedures seek to minimize customer confusion and exorbitant costs. These procedures also seek to create equal marketing opportunities for BPP service participants and provide the greatest ease of implementation.

K. "How Commercial Credit Cards And Foreign-Issued Calling Cards Would Be Handled In A BPP Environment."

The development time required for incorporation of this potentially more involved functionality would likely delay the initial implementation of BPP. Later phases of BPP functionality could include processing requirements for processing commercial credit card calls and calls billed to information assigned by telephone companies outside of the North American Numbering Plan.

L. "The Process By Which A Secondary OSP Might Be Assigned To Each Telephone Line."

"Teaming" between regional and other regional or national interexchange carriers should be the means of populating the APC and IPC, with procedures for allowing customers to change. Customer solicitation for APC and IPC carrier choices would lead to greatly increased customer confusion and needless expenses. Additionally, to avoid instances of the APC not being able to provide the required service and, thus, having to follow a procedure which would result in calls not being routed based on the billed party's IXC, requirements should exist to limit the APCs available for selection to those carriers which provide services from the area of call origination.

VI. CONCLUSION.

SWBT continues to believe the concept of BPP is the direction required for convenient network utilization. However, there is no apparent agreement or understanding of a common definition of the BPP service concept. SWBT cannot, at this time, because of the absence of reliable information from vendors and other BPP implementation stakeholders, predict that the public and pro-competitive benefits of BPP can be realized in a cost-effective, affordable manner. SWBT will continue to seek the information it requires to develop prudent decisions on the implementation of BPP.

Respectfully submitted,

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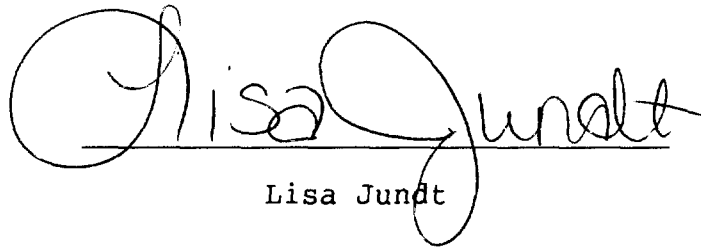
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CERTIFICATE OF SERVICE

I, Lisa Jundt, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company" in Docket # 92-77 has been served this 7th day of July to the Parties of Record.

A handwritten signature in cursive script, reading "Lisa Jundt", is written over a horizontal line. The signature is fluid and stylized, with the first letter 'L' being particularly large and looping.

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